

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

A.G., a minor child, by and through her
mother and next of friend, K.C.; D.A., a minor
child, by and through her mother and next of
friend, B.A.; A.L., a minor child, by and
through her mother and next of friend, C.T.;
M.K., a minor child, by and through her
mother and next of friend, K.K.; and M.H., a
minor child, by and through her mother and
next of friend, B.H.,

Plaintiffs,

v.

AUTAUGA COUNTY BOARD OF EDUCATION;
JOSEPH L. BUTLER; DENE CLEVELAND and
TERRY WRIGHT,

Defendants.

CASE NO.: 2:05-CV-1090-MEF

B.H., a minor child, by and through his
mother and next of friend, D.S.,

Plaintiffs,

v.

AUTAUGA COUNTY BOARD OF
EDUCATION; JOSEPH L. BUTLER; DENE
CLEVELAND and TERRY WRIGHT,

Defendants.

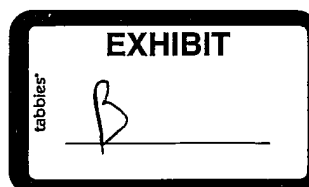
CASE NO.: 2:06cv393-SRW

STATE OF ALABAMA)

COUNTY OF MONTGOMERY)

AFFIDAVIT OF SCOTT THOMAS

Before me, the undersigned, a Notary Public in and for the State of
Alabama at Large, personally appeared Scott Thomas, who is known to me and
who being by me first duly sworn, on oath deposes and says as follows:



My name is Scott Thomas and I am over the age of nineteen years.

I am currently the Director of Internet Services for the law firm of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. and held this position since February 7, 2007. Before receiving this position, I was Director of Technology, for the law firm of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. I have held this position since October 2005. Prior to that time, I was the Lead Web Designer of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. and was hired for that position in May of 2004.

I have had 24 years of on-hand experience in the computer field. I received formal computer training at Louisiana State University, Auburn University and Trenholm State Technical College.

I am familiar and experienced with all Windows Operating Systems, including the following:

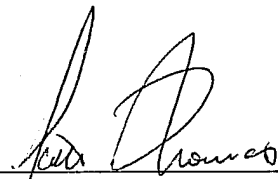
1. MS-DOS;
2. Windows 1.0-3.11;
3. Windows 95-98;
4. Windows ME;
5. Windows XP;
6. Windows NT – NT Workstation;
7. Windows 2000; and
8. Winders Server 2003.

I have reviewed the documents produced to Plaintiffs counsel representing the computer indexes for the date the document was created.

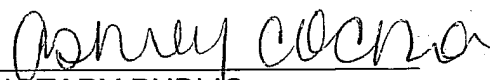
The indexes provided to Plaintiffs counsel only represents one folder on each of the computers, which is listed as "My Documents" folder. There are many other computer folders, which contain more computer files, which would represent *Plaintiff's Seventh Request for Production of Computer Indexes*.

Also, I have reviewed the letter from defense counsel indicating there are no indexes available for the computers of Dene Cleveland and Bobby Ziegler because of the type of software that is on the computer.

I have personal knowledge and experience that those computer indexes are available under the type software, which was represented by the defense counsel in her letter dated March 12, 2007.


SCOTT THOMAS

Sworn to and Subscribed before me on this the 3rd day of April,
2007.


NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 16, 2010